



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

June 9, 2025

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
Chief United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: *United States v. Alon Alexander, Oren Alexander, and Tal Alexander,*
24 Cr. 676 (VEC)**

Dear Judge Caproni and Judge Netburn:

The Government respectfully submits this letter in opposition to the defendants' motion to waive their appearance at the arraignment scheduled for June 10, 2025. Dkt. 68.

The defendants have once before waived their appearance in this case. On January 16, 2025, Judge Caproni held a consolidated bail argument for all defendants. Judge Caproni allowed the defendants to waive their appearances at that proceeding but made clear it would not be permitted again. Specifically Judge Caproni said, "[j]ust to be clear, I agreed to this because of the unusual circumstances of your client not being removed up to New York. This is kind of a one-time thing. I don't let defendants waive their appearance at court appearances, but I agreed for this time." Dkt. 37 at 4 (transcript of 1/16/25 bail argument).

The defendants have not cited a sufficient reason to permit them to waive their appearances in court, and their motion should be denied. In the face of Judge Caproni's clear statement that she does not "let defendants waive their appearance at court," Dkt. 37 at 4, the defendants have offered nothing more than their preference to "avoid being custodially transported to Court," Dkt. 68 at 1, as the reason for their motion. This is plainly insufficient.

The defendants' motion should be denied.

Respectfully submitted,

JAY CLAYTON
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